

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
) Docket No. 72-1051
HOLTEC INTERNATIONAL)
)
(Consolidated Interim Storage) November 19, 2018
Facility Project))

**RESPONSE BY PETITIONERS SIERRA CLUB, BEYOND NUCLEAR, DON'T
WASTE MICHIGAN, CITIZENS FOR ALTERNATIVES TO CHEMICAL
CONTAMINATION, PUBLIC CITIZEN, SAN LUIS OBISPO MOTHERS FOR
PEACE, NUCLEAR ENERGY INFORMATION SERVICE, CITIZENS
ENVIRONMENTAL COALITION, NUCLEAR ISSUES STUDY GROUP,
ALLIANCE FOR ENVIRONMENTAL STRATEGIES, FASKEN LAND AND
MINERALS AND PERMIAN BASIN LAND AND ROYALTY OWNERS TO
LICENSING BOARD ORDER REGARDING ORAL ARGUMENT**

The above-named Petitioners jointly submit this Response to the November 7, 2018, Order Regarding Location and Method of Oral Argument, and state as follows:

1. The Petitioners have conferred and all concur that the oral argument regarding standing and admissibility of contentions should be held in Albuquerque, New Mexico, during the week of January 22-25, 2018.

2. The Petitioners believe the proceeding should be held in New Mexico because the citizens of New Mexico have the most at stake regarding the Holtec project. Further, the City of Albuquerque seems most appropriate because it is large enough to have adequate accommodations for the number of participants in the oral argument. In addition, Albuquerque will have adequate accommodations for the

expected gathering of citizens and media, and is more convenient and centrally located for media, allowing for public access to NRC proceedings. Finally, holding the arguments in Albuquerque will save time and expenses for additional transportation links required to hold the proceeding in Hobbs or Carlsbad. Lodging is also much more expensive in the Carlsbad and Hobbs area because of the oil industry workers needing lodging. Most of the Petitioners are non-profit public interest organizations whose attorneys are not from New Mexico and would need lodging, so it would be an undue economic burden for the Petitioners to have the proceedings in Hobbs or Carlsbad.

3. Petitioners also suggest that, based on the nature and number of contentions for each Petitioner, the arguments be scheduled for three days. The first day would be for Beyond Nuclear, Alliance for Environmental Strategies, Fasken et al., and NAC International. The second day would be for Don't Waste Michigan et al. The third day would be for Sierra Club.

/s/ Wallace L. Taylor

WALLACE L. TAYLOR
Law Offices of Wallace L. Taylor
4403 1st Ave. S.E., Suite 402
Cedar Rapids, Iowa 52402
319-366-2428; (Fax) 319-366-3886
e-mail: wtaylorlaw@aol.com
ATTORNEY FOR SIERRA CLUB

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CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 2.305, I certify that, on this date, copies of Response to Licensing Board Order Regarding Oral Argument were served upon the Electronic Information Exchange (the NRC's E-Filing System) in the above captioned proceeding.

/s/ *Wallace L. Taylor*

WALLACE L. TAYLOR
Law Offices of Wallace L. Taylor
4403 1st Ave. S.E., Suite 402
Cedar Rapids, Iowa 52402
319-366-2428; (Fax) 319-366-3886
e-mail: wtaylorlaw@aol.com

ATTORNEY FOR SIERRA CLUB